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November 20, 2020

Via ECF

The Honorable Loretta A. Preska,
United States District Court for the Southern District of New York,
500 Pearl Street,
New York, NY 10007.

Re: *Petersen Energía Inversora S.A.U., et al. v. Argentine Republic and YPF S.A.*, No. 15 Civ. 2739 (LAP) (“*Petersen*”); *Eton Park Cap. Mgmt. et al. v. Argentine Republic and YPF S.A.*, No. 16 Civ. 8569 (LAP) (“*Eton Park*”)

Dear Judge Preska:

Pursuant to Local Rule 5.2, Rule 2(H) of the Individual Practices of this Court, and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in these actions (the “Protective Order,” *Petersen* ECF No. 177; *Eton Park* ECF No. 124), Defendant the Argentine Republic (the “Republic”), together with Defendant YPF S.A. (“YPF”), which joins in this letter, respectfully move for an order granting leave to file under seal Defendants’ enclosed November 20, 2020 reply letter in support of a pre-motion conference and Exhibit 1 thereto. Exhibit 1 contains excerpts from the transcript of the November 4 and 5 deposition of Petersen’s Rule 30(b)(6) witness, Armando Betancor, that Plaintiffs have provisionally designated as confidential under the Protective Order. The Republic and YPF seek leave to file Exhibit 1 under seal and to redact portions of their publicly accessible pre-motion letter that quote from the deposition transcript of Mr. Bentacor and the transcript of the October 29 deposition of Burford Capital CEO Christopher Bogart, which this Court has previously ordered to be filed under seal (*Petersen*, ECF Nos. 205, 211; *Eton Park* ECF Nos. 144, 150).

Respectfully,

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.

cc: Counsel of Record